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March 7, 2018

VIA ELECTRONIC MAIL

Suzanne Rosen Singleton, Chief
Disability Rights Division
Consumer and Governmental Affairs Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *TRS State Certification Application,*
CG Docket No. 03-123

Dear Suzanne:

At the request of our client Virgin Islands Telephone Corp. d/b/a Viya (formerly Innovative Telephone) ("Viya"), we have enclosed a draft Telecommunications Relay Service ("TRS") certification renewal application ("Application") for the United States Virgin Islands ("USVI") that will soon be considered by the Virgin Islands Public Services Commission ("PSC") at an upcoming PSC meeting. We understand that, upon approval of the Application by the PSC, the PSC formally will file the Application with the Federal Communications Commission ("Commission"). The Application seeks reauthorization of the USVI's TRS program consistent with the requirements of 47 C.F.R. § 64.606 of the Commission's rules. The PSC requested Viya to prepare this Application with the assistance of Sprint Communications Company L.P. d/b/a Sprint Accessibility (formerly Sprint Relay) ("Sprint"). Sprint is the current TRS provider in the United States Virgin Islands ("USVI") pursuant to an agreement between Sprint and Viya that will expire on April 30, 2018. Viya expects to renew its agreement with Sprint for an additional five-year period.

As noted above, this Application is being provided to the Commission in draft format because the Application has not yet been formally approved by the PSC. We understand that the PSC expects to address and vote on the Application during an upcoming meeting. Because the Consumer and Governmental Affairs Bureau ("Bureau") already has commenced its review of the

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renewal certifications of other state telecommunications relay service programs,¹ and the Bureau only has a limited period of time to complete its review process, we are providing this draft Application to the Bureau now, in advance of its formal approval by the PSC. Once the Application has been approved by the PSC, the final version will be filed with the Commission, and copies will be provided to you and your colleagues.

Wilkinson Barker Knauer does not represent the PSC. We have been asked by Viya to provide this draft Application to the Commission as a courtesy.

Sincerely,

/s/ Phil Marchesiello

Phil Marchesiello

*Counsel to Virgin Islands Telephone Corp.
d/b/a Viya*

Enclosure

cc: Dana Wilson, CGB, DRO
The Honorable Raymond Williams, Chair, PSC
Donald Cole, Executive Director, PSC
Boyd Sprehn, Esquire

¹ See *Pleading Cycle Established for Comments on Applications for State Certification for the Provision of Telecommunications Relay Service*, Public Notice, CG Docket No. 03-123, DA 18-76 (CGB rel. Jan. 26, 2018) (setting comment and reply comment deadlines for the state TRS program certification renewal applications that have been filed with the FCC).